

Exhibit B

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNION DEL PUEBLO ENTERO, et al.,

Plaintiffs,

vs.

THE STATE OF TEXAS, et al.,

Defendants.

5:21-cv-844-XR (Consolidated
Cases)

**CONSOLIDATED PLAINTIFFS' NOTICE OF RULE 30(B)(6) DEPOSITION OF THE
DALLAS COUNTY REPUBLICAN PARTY**

TO: The Dallas County Republican Party, by and through John M. Gore, counsel for Jones Day, 51 Louisiana Ave NW, Washington, DC 20001, and to All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, counsel for the Consolidated Plaintiffs will take the oral deposition of the Dallas County Republican Party, testifying through an individual designated by the Dallas County Republican Party to testify on its behalf, concerning the matters listed on Exhibit A to this Notice. The deposition shall commence at 10:00 a.m. on January 16, 2023 at Reed Smith LLP, 2850 N Harwood St Suite 1500, Dallas, TX 75201. The deposition shall be recorded by stenographic means and may also be recorded by additional audiovisual means and shall take place before a notary public or other person authorized by law to administer oaths.

The designated deponent shall be prepared to testify as to matters within their knowledge and as to matters known by or reasonably available to the Dallas County Republican Party. This notice serves to inform the Dallas County Republican Party that it has a duty to make such designation. The Consolidated Plaintiffs request that the Dallas County Republican Party provide counsel for the Consolidated Plaintiffs with written notice, at least two days in advance of the

deposition, of the name and title of each witness who will testify for it and which topic(s), set forth in the attached Exhibit A, each such witness will testify about. The Consolidated Plaintiffs further request that the Dallas County Republican Party produce, at least two days in advance of the deposition, all documents, if any, that the designee(s) reviewed in preparation for the deposition. For these purposes “documents” is defined as set forth in Exhibit A.

Dated: October 21, 2022

Respectfully submitted,

By: /s/ Kathryn Sadasivan

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CERTIFICATE OF SERVICE

This is to certify that I caused a true and correct copy of the above and foregoing to be served on each counsel of record in the above-captioned matter by e-mail delivery on October 21, 2022.

/s/ Jennifer Holmes
Jennifer A. Holmes

EXHIBIT A

Definitions

Except as specifically defined below, the terms used in this request shall be construed and defined in accordance with the Federal Rules of Civil Procedure and the Local Rules of the U.S. District Court for the Western District of Texas, where applicable. Any terms not defined shall be given their ordinary meaning.

1. “Any” or “all” means “any and all.”
2. “Communication” is synonymous in meaning and scope to the term “communication” as used in Local Rule 26, and includes any transfer of information of any type, whether written, oral, electronic, or otherwise, and includes transfers of information via email, report, letter, text message, voicemail message, written memorandum, note, summary, and other means.
3. “Curbside voting” means the method of voting available to voters under Tex. Elec. Code § 64.009(a).
4. “Date” means the exact day, month, and year, if ascertainable, or, if not, the best available approximation (including relationship to other events).
5. “Document” is synonymous in meaning and scope to the term “document” as used in Federal Rule of Civil Procedure 34 and Local Rule 26 and includes, but is not limited to, records, reports, lists, data, statistics, summaries, analyses, communications (as defined above), computer discs, tapes, printouts, emails, databases, and any handwritten, typewritten, printed, electronically recorded, taped, graphic, machine-readable, or other material, of whatever nature and in whatever form, including all non-identical copies and drafts thereof, and all copies bearing any notation or mark not found on the original.
6. “Drive-thru voting” means any method of voting in which a voter casts a vote from inside a motor vehicle.

7. “Drop box voting” means any method of voting in which a voter casts a vote by depositing their ballot in a ballot box located outside of a polling place.
8. “Early voting” means any method of voting that occurs prior to the uniform election date for a primary or general election.
9. “Election clerk” means any individual appointed by the presiding judge of an election precinct to assist the judge in the conduct of an election at the polling place for a primary or general election pursuant to Tex. Elec. Code § 32.031 et seq.
10. “Election judge” means any individual appointed as a presiding judge or an alternate presiding judge for a primary or general election pursuant to Tex. Elec. Code § 32.001 et seq.
11. “Electoral prospects” means the likelihood or apparent probability of a candidate or potential candidate’s successful attainment of elected office.
12. “Extended hour voting” means any method of voting in which a voter casts a ballot at a polling place between the hours of 7:00 p.m. and 7:00 a.m.
13. “HB 3” means the legislation designated as House Bill 3, titled “Relating to election integrity and security, including by preventing fraud in the conduct of elections in this state; increasing criminal penalties; creating criminal offenses,” that was introduced during the 87th First Called Session of the Texas Legislature, including any predecessor or related bills from any legislative session in 2021.
14. “HB 6” means the legislation designated as House Bill 6, titled “Relating to election integrity and security, including by preventing fraud in the conduct of elections in this state; increasing criminal penalties; creating criminal offenses,” that was introduced during the 87th Regular Session of the Texas Legislature, including any predecessor or related bills from any legislative session in 2021.

15. “Including” means including, but not limited to.
16. “Intervenor-Defendants” means Intervenor Harris County Republican Party, Dallas County Republican Party, Republican National Committee, National Republican Senatorial Committee, or National Republican Congressional Committee, including their current and former employees, officers, attorneys, agents, trustees, investigators, representatives, contractors, consultants, or other persons or entities acting on Intervenor’s behalf or subject to Intervenor’s control.
17. “Local Officials” means the current and former employees, officers, attorneys, agents, trustees, investigators, representatives, contractors, and consultants of any political subdivision or office of a political subdivision of the state of Texas, including by not limited to Texas County Election Administrator’s Offices, Texas County District Attorney’s Offices, Texas County Criminal District Attorney’s Offices, Texas County Attorney’s Offices, Texas County Clerk’s Offices, and Texas County Tax-Assessor-Collector’s Offices.
18. “Office of the Texas Attorney General” and “Attorney General” means the Office of the Texas Attorney General and includes the Texas Attorney General and his predecessors and successors in their official capacities as Texas Attorney General, as well as the current and former employees, officers, attorneys, agents, trustees, investigators, representatives, contractors, and consultants of the Office of the Texas Attorney General.
19. “Office of the Texas Governor” and “Governor” means the Office of the Texas Governor and includes the Texas Governor and his predecessors and successors in their official capacities as Texas Governor, as well as the current and former employees, officers, attorneys, agents, trustees, investigators, representatives, contractors, and consultants of the Office of the Texas Governor.

20. “Office of the Texas Lieutenant Governor” and “Lieutenant Governor” means the Office of the Texas Lieutenant Governor and includes the Texas Lieutenant Governor and his predecessors and successors in their official capacities as Texas Lieutenant Governor, as well as the current and former employees, officers, attorneys, agents, trustees, investigators, representatives, contractors, and consultants of the Office of the Texas Lieutenant Governor.

21. “Office of the Texas Secretary of State” and “Secretary of State” means the Office of the Texas Secretary of State and includes the Texas Secretary of State and his predecessors and successors in their official capacities as Texas Secretary of State, as well as the current and former employees, officers, attorneys, agents, trustees, investigators, representatives, contractors, and consultants of the Office of the Texas Secretary of State.

22. “Poll watcher” means any individual appointed to observe the conduct of an election on behalf of a candidate, a political party, or the proponents or opponents of a measure for a primary or general election pursuant to Tex. Elec. Code § 33.001 et seq.

23. “Poll worker” means any individual, other than an election clerk or election judge, who assists in administering an election at a polling place for a primary or general election.

24. “SB 1” means the legislation designated as Senate Bill 1, titled “Relating to election integrity and security, including by preventing fraud in the conduct of elections in this state; increasing criminal penalties; creating criminal offenses,” that was enacted during the 87th Second Called Session of the Texas Legislature and signed by the Governor of Texas on September 7, 2021, including any predecessor or related bills from any legislative session during 2021.

25. “SB 7” means the legislation designated as Senate Bill 7, titled “Relating to election integrity and security, including by preventing fraud in the conduct of elections in this state;

increasing criminal penalties; creating criminal offenses,” that was introduced during the 87th Regular Session of the Texas Legislature, including any predecessor or related bills from any legislative session in 2021.

26. “Straight-ticket voting” means any method of voting in which a party may select a political party’s candidates in one motion or gesture.

27. “Texas Legislature” means the current and former members, officers, and staff of the Texas Senate and Texas House of Representatives and any committees or agencies thereof, and the current and former employees, officers, attorneys, agents, trustees, investigators, representatives, contractors, and consultants thereof.

28. “Vote-by-mail” means any method of voting in which a voter casts a ballot received in the mail.

29. “Voter” means any registered voter in Texas and all persons who may properly register to vote in Texas by the close of discovery in this case.

30. “Voter assistance” means any conduct permitted under Section 64.0321 of the Texas Election Code or required by Sections 203 and 208 of the Voting Rights Act, 52 U.S.C. §§ 10503, 10508.

31. “You” and “your” means the Dallas County Republican Party, including its current and former employees, officers, attorneys, agents, trustees, investigators, representatives, contractors, consultants, or other persons or entities acting on behalf or subject to the control of the Dallas County Republican Party.

Deposition Topics

1. The connection or relationship between any provision of SB 1 and the electoral prospects of any candidates for elected office in Texas supported by Intervenor-Defendants and the basis, including any evidence, to support that connection or relationship.

2. Your knowledge and information regarding SB 1 (including its predecessor bills), SB 7, HB 6, or HB 3, including but not limited to the drafting, amendment, effect, intent, implementation, or enforcement of such legislation.
3. Your work on, involvement with, strategy for, and evaluation of SB 1 (including its predecessor bills), SB 7, HB 6, or HB 3, including but not limited to the drafting, amendment, effect, intent, implementation, or enforcement of such legislation.
4. Your understanding and interpretation of the following provisions of SB 1 (hereinafter, “the Challenged Provisions”):
 - (a) SB 1 §§ 2.04-2.08
 - (b) SB 1 § 2.11
 - (c) SB 1 § 3.04
 - (d) SB 1 §§ 3.09–3.10
 - (e) SB 1 §§ 3.12–3.13
 - (f) SB 1 § 3.15
 - (g) SB 1 §§ 4.01–4.02
 - (h) SB 1 §§ 4.06–4.07
 - (i) SB 1 § 4.09
 - (j) SB 1 § 4.12
 - (k) SB 1 §§ 5.01–5.04
 - (l) SB 1 §§ 5.06–5.08
 - (m) SB 1 § 5.10
 - (n) SB 1 § 5.13
 - (o) SB 1 § 5.12, 5.14
 - (p) SB 1 § 6.01
 - (q) SB 1 §§ 6.03–6.07
 - (r) SB 1 § 7.04
 - (s) SB 1 § 8.01

5. All suggestions, proposals, strategies or other analysis that were prepared, reviewed, considered, evaluated, sent or received by You, whether in draft form or otherwise, regarding legislation relating to the subject matter of SB 1, or its predecessor bills, SB 7, HB 6, or HB 3, including but not limited to the drafting, amendment, effect, intent, implementation, or enforcement of such legislation.
6. All information and documents sent to or exchanged with any members of the Texas Legislature and/or legislative committees (including staff), regarding SB 1, or its predecessor bills, SB 7, HB 6, or HB 3, including but not limited to the drafting, amendment, effect, intent, implementation, or enforcement of such legislation.
7. All information and documents sent to or exchanged with any members of the Texas Legislature and/or legislative committees (including staff), relating to election administration, voting, election integrity, or the conduct of elections from January 1, 2020, to present.
8. All information and documents sent to or exchanged with the Office of the Texas Governor, the Office of the Texas Attorney General, the Office of the Texas Lieutenant Governor, and/or the Office of the Texas Secretary of State, regarding SB 1, SB 7, HB 6, or HB 3, including but not limited to the drafting, amendment, effect, intent, implementation, interpretation, or enforcement of such legislation.
9. All information and documents sent to or exchanged with the Office of the Texas Governor, the Office of the Texas Attorney General, the Office of the Texas Lieutenant Governor, and/or the Office of the Texas Secretary of State, relating to election administration, voting, election integrity, or the conduct of elections from January 1, 2020, to present.
10. All information and documents sent to or exchanged with local officials, relating to election administration, voting, election integrity, or the conduct of elections from January 1, 2020, to present.
11. All information and documents sent to or exchanged with the following third-party organizations, including any of their affiliates or subsidiaries, and the current and former employees, officers, attorneys, agents, trustees, investigators, representatives, contractors, consultants thereof, or other persons or entities acting on their behalf or subject to their control, regarding SB 1, SB 7, HB 6, or HB 3, including but not limited to the drafting, amendment, effect, intent, implementation, interpretation, or enforcement of such legislation:
 - (a) The Republican Party of Texas;
 - (b) The Heritage Foundation;
 - (c) The Texas Public Policy Foundation;
 - (d) The American Legislative Exchange Council;
 - (e) The State Policy Network;

- (f) Honest Elections Project;
 - (g) Public Interest Legal Foundation;
 - (h) American Civil Rights Union;
 - (i) Project Veritas;
 - (j) True the Vote;
 - (k) The Texas Election Network;
 - (l) The Harris County Republican Party;
 - (m) The Republican National Committee;
 - (n) The National Republican Senatorial Committee; and
 - (o) The National Republican Congressional Committee.
12. All information and documents sent to or exchanged with the following third-party organizations, including any of their affiliates or subsidiaries, and the current and former employees, officers, attorneys, agents, trustees, investigators, representatives, contractors, consultants thereof, or other persons or entities acting on their behalf or subject to their control, relating to election administration, voting, election integrity, or the conduct of elections from January 1, 2020, to present:
- (a) The Republican Party of Texas;
 - (b) The Heritage Foundation;
 - (c) The Texas Public Policy Foundation;
 - (d) The American Legislative Exchange Council;
 - (e) The State Policy Network;
 - (f) Honest Elections Project;
 - (g) Public Interest Legal Foundation;
 - (h) American Civil Rights Union;
 - (i) Project Veritas;
 - (j) True the Vote;
 - (k) The Texas Election Network;

- (l) The Harris County Republican Party;
 - (m) The Republican National Committee;
 - (n) The National Republican Senatorial Committee; and
 - (o) The National Republican Congressional Committee.
13. All information and documents regarding the training of election judges, clerks, and other poll workers from January 1, 2018, to present, including guidance, advisories, directives, trainings, materials, presentations or instructions created, used, or disseminated by You.
 14. All information and documents regarding the recruitment, retention, and training of poll watchers in Texas from January 1, 2018, to present, including guidance, advisories, directives, trainings, materials, presentations or instructions created, used, or disseminated by You.
 15. All information or documents regarding instances of violence, discrimination, harassment, intimidation, misconduct, or any inappropriate behavior from poll watchers, election judges, election clerks, or other poll workers in Texas from January 1, 2018, to present.
 16. All information and documents sent to or exchanged with candidates or potential candidates for elected office in Texas, regarding SB 1, or its predecessor bills, SB 7, HB 6, or HB 3, including but not limited to the drafting, amendment, effect, intent, implementation, or enforcement of such legislation.
 17. All information and documents sent to or exchanged with candidates or potential candidates for elected office in Texas relating to election administration, voting, election integrity, or the conduct of elections from January 1, 2020, to present.
 18. All information and documents regarding any incidents, allegations, discussions, or investigations of illegal voting, election fraud, or any kind of criminal conduct in connection with the following methods of voting in Texas, from January 1, 2018, to the present:
 - (a) Drive-Thru Voting;
 - (b) Drop-Box Voting;
 - (c) Extended Hour Voting;
 - (d) Straight-Ticket Voting;
 - (e) Vote-by-mail;
 - (f) Early Voting;
 - (g) Curbside Voting;

- (h) Voting with assistance in person, including transportation assistance for curbside voting; and
 - (i) “Vote harvesting services,” as defined SB 1.
- 19. All information and documents regarding the impact or potential impact of SB 1, or its predecessor bills, SB 7, HB 6, or HB 3, including but not limited to the drafting, amendment, effect, intent, implementation, or enforcement of such legislation on racial or ethnic minorities, persons with disabilities, persons with limited English proficiency, or partisan affiliation.
- 20. All information and documents regarding the usage of the following methods of voting in Texas by voters and by counties, including any information about the demographic or political breakdown of voters, racial or ethnic minorities, persons with limited English proficiency, persons with disabilities, or partisan affiliation, from January 1, 2018, to the present:
 - (a) Drop-Box Voting;
 - (b) Drive-Thru Voting;
 - (c) Extended Hour Voting;
 - (d) Straight-Ticket Voting;
 - (e) Vote-by-mail;
 - (f) Early Voting;
 - (g) Curbside Voting;
 - (h) Voting with assistance in person, including transportation assistance for curbside voting;
 - (i) Voting with assistance by mail; and
 - (j) “Vote harvesting services,” as defined SB 1.
- 21. All information and documents regarding the impact or potential impact of SB 1, or its predecessor bills, SB 7, HB 6, or HB 3, including but not limited to the drafting, amendment, effect, intent, implementation, or enforcement of such legislation on the following counties:
 - (a) Bexar County;
 - (b) Dallas County;
 - (c) Harris County;

- (d) El Paso County;
 - (e) Hidalgo County; or
 - (f) Travis County.
- 22. All information and documents regarding the number or proportion of Texas residents, Texas citizens of voting age, or Texas registered voters who have, or lack, a Texas Driver's License, a Texas Election Identification Certificate, a Texas Personal Identification Card, or a Social Security Number, including patterns by race, ethnicity, disability status, or party affiliation from January 1, 2020, to present.
 - 23. All information and documents regarding any problems, questions, concerns, or difficulties raised by members of the public related to the SB 1's requirements to provide an identification number on Applications for Ballot By Mail and to provide an identification number on the carrier envelope of a mail ballot.
 - 24. All information and documents regarding voter assistance, including transportation assistance for curbside voters, and "vote harvesting services" as defined by SB1, and patterns of requests for voter assistance by race, ethnicity, disability status, or party affiliation during the period from January 1, 2020, to present, including, but not limited to any guidance, advisories, directives, trainings, or instructions.
 - 25. All information and documents regarding the changing demographics of Texas voters, voter turnout by particular demographic groups, including but not limited to, racial or ethnic minorities, persons with limited English proficiency, persons with disabilities, or partisan affiliation; or particular voting practices in Texas.
 - 26. All pleadings filed by you in this or any related lawsuit.
 - 27. All discovery responses served by you in this or any related lawsuit.
 - 28. All documents produced by you in this or any related lawsuit.